

GABRIEL L. GRASSO, ESQ.  
Nevada Bar No. 7358  
**GABRIEL L. GRASSO, P.C.**  
411 South 6<sup>th</sup> Street  
Las Vegas, NV 89101  
T: (702) 868-8866  
F: (702) 868-5778  
E: gabriel@grassodefense.com  
Attorney for ELKIND

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHEENA ELKIND,

Defendant.

Case No.: 2:20-mj-00709-BNW-1

**STIPULATION TO CONTINUE  
PRELIMINARY EXAMINATION DATE**

**(ELEVENTH REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, District of Nevada, and Edward G. Veronda, Assistant United States Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel for SHEENA ELKIND, that the Preliminary Examination hearing currently scheduled for January 27, 2021 at 10:00 a.m., be vacated and set to a date and time convenient to this court but no sooner than ninety (90) days.

The Stipulation is entered into for the following reasons:

1. Following continued investigation by both parties to this matter, plea negotiations are continuing and will require the additional requested time to resolve.
2. Ms. ELKIND is on Pretrial Release and does not object to the continuance.
3. The parties agree to the continuance.

- 1           4. The additional time requested herein is not sought for purposes of delay, but  
2           merely to allow counsel for defendant sufficient time within which to be able to  
3           effectively and complete investigation of the discovery materials provided.  
4           5. Denial of this request for continuance would result in a miscarriage of justice.  
5           6. The additional time requested by this Stipulation is excusable in computing the  
6           time within which the trial herein must commence pursuant to the Speedy Trial  
7           Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors  
8           under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).  
9           7. This is the eleventh request for a continuance of the preliminary hearing date in  
10          this case.

11  
12          DATED this 19<sup>th</sup> day of January 2022.

13          GABRIEL L. GRASSO, P.C.  
14          Counsel for SHEENA ELKIND

CHRISTOPHER CHIOU  
Acting United States Attorney

15          By /s/ Gabriel L. Grasso  
16          GABRIEL L. GRASSO, ESQ.

By /s/ Edward G. Veronda  
Assistant United States Attorney

GABRIEL L. GRASSO, ESQ.  
 Nevada Bar No. 7358  
**GABRIEL L. GRASSO, P.C.**  
 411 South 6<sup>th</sup> Street  
 Las Vegas, NV 89101  
 T: (702) 868-8866  
 F: (702) 868-5778  
 E: gabriel@grassodefense.com  
 Attorney for ELKIND

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHEENA ELKIND,

Defendant.

Case No.: 2:20-mj-00709-BNW-1

**FINDINGS OF FACT, CONCLUSIONS  
 OF LAW AND ORDER**

**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Plea negotiations are continuing and will require the additional requested time to resolve
2. Ms. ELKIND is on Pretrial Release and does not object to the continuance.
3. The parties agree to the continuance.
4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
5. Denial of this request for continuance would result in a miscarriage of justice.

